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13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION**

18 **-and-**

19 **PACIFIC GAS AND ELECTRIC
COMPANY,**

20 **Debtors.**

21 Affects PG&E Corporation
22 Affects Pacific Gas and Electric Company
23 Affects both Debtors

24 *All papers shall be filed in the Lead Case,
25 No. 19-30088 (DM)

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

26 **DECLARATION OF LYNDA
BRADWAY IN SUPPORT OF MOTION
OF THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS PURSUANT TO 11
U.S.C. §§ 105(a) AND 501 AND FED. R.
BANKR. P. 3003(c) FOR ENTRY OF AN
ORDER EXTENDING THE BAR DATE**

27 Date: November 13, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102
Objection Deadline: November 6, 2019

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:) Bankr. Case No. 19-30088-DM
PG&E CORPORATION)
-and-)
PACIFIC GAS AND ELECTRIC)
COMPANY,)
Debtors.) DECLARATION OF LYNDA BROADWAY
) IN SUPPORT OF MOTION TO EXTEND
) CLAIMS BAR DATE
)
) Date: TBD
) Time: TBD
) Place: United States Bankruptcy Court
) Courtroom 17, 16th Floor
) San Francisco, CA 94102
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I, Lynda Bradway, declare as follows:

1. I am over 18 years of age. I have personal knowledge of the facts contained in this declaration, and if called as a witness, I could and would testify competently thereto.
2. I used to reside on Washo Court in Magalia, California. On November 8, 2018, the mobile home I rented was destroyed by the Camp Fire. I had lived in the home for

1 four years. I did not have insurance. As a result of the fire, I lost my home, all my
2 personal belongings, and my entire community.

3 3. My sister was in the process of moving back in with me. She had just been hired for
4 a new job at Grocery Outlet in Paradise on Clark Road.

5 4. On the morning of the fire, my sister and I fled my home to a parking lot in Magalia.
6 We quickly became trapped and were escorted through the fire and down the hill by
7 the sheriffs and firefighters. My sister left her car behind and it was destroyed. If it
8 were not for these first responders directing us to safety, we would have died.

9 5. I was low on gas but kept driving. We decided to “go for it” since we had no choice.
10 As we drove down the hill, we were surrounded by flames on both sides of the car
11 and we nearly ran out of gas.

12 6. After the fire, I stayed at a shelter at a church in Oroville, California until I could find
13 housing. I was unable to locate housing anywhere in Northern California. My ex-
14 husband offered me temporary housing in San Diego. With no other options, I
15 relocated 600 miles away to San Diego and now live at his place. Since the fire, I can
16 only drive short distance, such as just down the street. My daughter will drive me if I
17 need to go far. It is very hard. I don’t have a job and my disability has run out. There
18 was not really any talk about PG&E or the fires in San Diego.

19 7. The Grocery Outlet in Paradise also burned down and my sister lost her job.

20 8. Since I was a renter, and not a homeowner, I was under the belief that I did not qualify to
21 bring a lawsuit or claim against PG&E for my losses. At the same time, I heard that
22 PG&E might file for bankruptcy, but I didn’t know they did. So, I believed that
23 money was not available to compensate fire victims anyway.

24 9. I did receive a notice, but I wasn’t sure what to do. I thought it might be scam. I do
25 not recall it coming with the normal PG&E envelope that PG&E customers get. The
26 questions were confusing; I didn’t understand what they meant. It is very difficult for
27 me to talk about the fire and for me to have to relive my experiences both during and

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1 after the fire. Even reading the questions caused me distress.

2 10. A friend suggested that I reach out to a law firm and double-check whether I could
3 recover for my losses. After speaking with an attorney, I learned that PG&E had
4 money available to pay fire victims, that renters qualify in addition to homeowners,
5 and that I was eligible to recover for the loss of my property and other damages. I
6 would not have signed up as a claimant in this proceeding if my friend did not inform
7 me that I might have a claim, and if my lawyers did not help me understand my right
8 to participate.

9 11. I have two sisters who suffered losses in the Camp Fire, and I have since alerted
10 them to pursue their claims, as well. They didn't know they could file claims until I
11 told them.

12 12. I feel there are many other people who are uninformed about their right to recover
13 damages in this bankruptcy case or even that there is a deadline.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed this 6th day
15 of October, 2019 in San Diego, California.

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28 Lynda Bradway